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November 10, 2010

The Hon. John P. Fullam  
United States District Court for the  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106

**Re: The Abi Jaoudi and Azar Trading Corp. vs. CIGNA Worldwide  
Insurance Co. (No. 91-6785)**

Dear Judge Fullam:

We write on behalf of CIGNA Worldwide ("CWW") to request the entry of the attached Order.

We understand that Respondent Josie Senesie has made an application to the United States Department of State (the "Department") for a statement of interest in the above-captioned matter with respect to Senesie's assertion of common-law immunity.

On November 2, 2010, the Department wrote to counsel for the parties to schedule meetings with the parties to solicit their views with respect to the application. Based on the timing of those meetings and our subsequent conversations with the Department, it appears that an additional 60 days will be required for the Department to receive and consider the parties' views. CWW therefore requests that the Court grant an additional 60 days for the Department to provide a response, if any, to Mr. Senesie's application, or to inform the Court that it requires additional time to consider that application.

In connection with this extension, CWW does not object to providing a commensurate extension of the time for Mr. Senesie and his successor, Mr. Sesay, to respond to the pending discovery requests served by CWW on October 25, 2010. We have contacted counsel for Mr. Senesie and Mr. Sesay, who indicated that he did not have the authority at this time from his client to agree to this request.

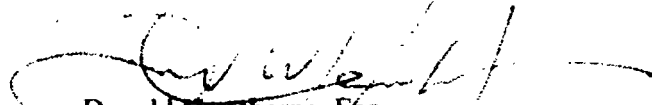
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We therefore request that the Court enter the attached Order, requesting that the Department respond to Senesie's application on or before January 21, or inform the Court by that date if it requires additional time to do so.

Respectfully submitted,



Donald Hawthorne, Esq.

cc: Mary Catherine Malin, Esq.,  
Assistant Legal Adviser for Diplomatic Law and Litigation  
United States Department of State  
Henry F. Reichner, Esq.  
Mark Gottlieb, Esq.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

-----X  
THE ABI JAOUDI AND AZAR TRADING CORP., :

Plaintiff, :

-against- :

CIGNA WORLDWIDE INS. CO., :

Defendant. :

Civil Action No. 91-6785

**ORDER**

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WHEREAS, Defendant CIGNA Worldwide Insurance Co. ("CWW") has filed a Motion for Contempt in the above-titled proceeding seeking Orders of contempt against, among others, Plaintiff the Abi Jaoudi & Azar Trading Corp., Josie P. Senesie ("Senesie") and Samuel M. Lohman (together, "Respondents" and, together with CWW, "the Parties") that is currently pending before this Court;

WHEREAS by Minute Entry dated September 24, 2010, the Court Ordered that discovery could commence within 30 days, and that counsel for Senesie should make an application to the United States Department of State for a statement of interest in this matter;

WHEREAS on October 25, 2010, CWW served interrogatories, requests for the production of documents and notices of deposition on counsel for Senesie and Mr. Foday Sesay, Senesie's successor as Liberian-appointed receiver for the Liberian branch and business of CWW ("Sesay"), such requests and interrogatories (the "Requests") requiring a response on or before November 24, 2010;

WHEREAS the Court has been informed that an application has been made regarding this matter to the Department of State; and

NOW, THEREFORE, this \_\_\_\_ day of November, 2010, upon consideration of the letter submitted by counsel for CWW on November 10, 2010, and upon all pleadings and proceedings herein, it is hereby:

ORDERED that the Department of State is requested to provide a response, if any, to said application, or to inform the Court if it requires additional time to consider that application, on or before January 21, 2010; and it is further

ORDERED that the date set by the Requests for a response from Senesie and Sesay is adjourned, and Senesie and Sesay shall respond as required by the Requests on or before January 24, 2010.

Dated: Philadelphia, Pennsylvania  
November \_\_\_\_, 2010

BY THE COURT:

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JOHN P. FULLAM  
UNITED STATES DISTRICT JUDGE